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INTERVENTION



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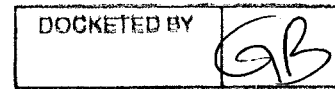
IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
A HEARING TO DETERMINE THE FAIR
VALUE OF THE UTILITY PROPERTY OF THE
COMPANY FOR RATEMAKING PURPOSES,
TO FIX A JUST AND REASONABLE RATE OF
RETURN THEREON, TO APPROVE RATE
SCHEDULES DESIGNED TO DEVELOP SUCH
RETURN.

DOCKET NO. E-01345A-16-0036

Arizona Corporation Commission

DOCKETED

NOV 10 2016



IN THE MATTER OF FUEL AND PURCHASED
POWER PROCUREMENT AUDITS FOR
ARIZONA PUBLIC SERVICE COMPANY

DOCKET NO. E-01345A-16-0123

**APPLICATION FOR LEAVE TO
INTERVENE**

Pursuant to A.A.C. R14-3-105, REP America d/b/a/ ConservAmerica ("ConservAmerica")
applies for leave to intervene in this case. In support of this application, ConservAmerica states
that:

1. ConservAmerica is a 501(c)(4) social welfare organization founded in 1995 under
the name Republicans for Environmental Protection. ConservAmerica's mission is to educate the
public and elected officials on conservative approaches to today's environmental, energy, and
conservation challenges. ConservAmerica recognizes the reality of climate change and the
challenges it poses to America's climate, economy and way of life. These challenges are acute
here in Arizona. ConservAmerica promotes conservative environmental policies that will reduce
greenhouse gas emissions, reduce the worst impacts of climate change, and grow a stronger, more
resilient economy. In furtherance of these goals, ConservAmerica takes positions on many
environmental and economic issues, such as energy subsidies, taxation of energy, and utility rate
design. For example, ConservAmerica believes that revenues earned from zero emissions energy

1 sources should be tax free, as outlined in its “Zero Regrets Energy & Tax Policy”, available at
2 [http://conservamerica.org/wp-content/uploads/2016/10/Zero-Regrets-Energy-](http://conservamerica.org/wp-content/uploads/2016/10/Zero-Regrets-Energy-Policy.pdf)
3 [Policy.pdf](http://conservamerica.org/wp-content/uploads/2016/10/Zero-Regrets-Energy-Policy.pdf). ConservAmerica believes that America must invest in cleaner energy that is made in
4 America, as detailed in its “Cleaner. Here. Now.” energy policy, available at
5 <http://conservamerica.org/issue/energy-cleaner-here-now/>

6 2. ConservAmerica has members in APS’s service territory and it employs staff in the
7 APS service territory.

8 3. This case presents important environmental issues, as shown by the intervention of
9 other environmental groups such as Western Resource Advocates and Southwest Energy
10 Efficiency Project. These environmental issues include questions about electric rate design and
11 subsidies for solar. ConservAmerica is directly and substantially interested in these issues.

12 4. ConservAmerica is familiar with the issues in this case, and ConservAmerica’s
13 intervention will not unduly broaden the issues or delay the proceeding.

14 5. ConservAmerica requests that all pleadings, correspondence, discovery, and other
15 documents be served on the following:

16 Timothy J. Sabo
17 Snell & Wilmer L.L.P.
18 One Arizona Center
19 400 East Van Buren
20 Phoenix, AZ 85004-2202
21 Phone: 602.382.6347
22 Fax: 602.382.6070
23 E-mail: tsabo@swlaw.com

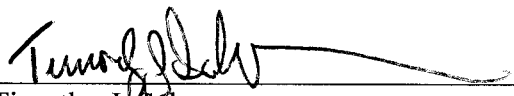
24 And

25 Paul J. Walker
26 Executive Director
27 ConservAmerica
971 South Centerville Road
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Sturgis, MI 49091
pwalker@conservamerica.org

1 WHEREFORE, ConservAmerica requests that the Commission or the presiding
2 Administrative Law Judge approve ConservAmerica's Application for Leave to Intervene and
3 grant ConservAmerica the status, rights and obligations of an Intervenor under the Commission's
4 rules.

5 RESPECTFULLY SUBMITTED this 10th day of November 2016.

6 Snell & Wilmer, L.L.P.

7
8 By 
9 Timothy J. Sabo
10 One Arizona Center
11 400 East Van Buren Street
12 Phoenix, Arizona 85004

13 Attorney for REP America d/b/a/ ConservAmerica

14
15 Original and 13 copies of the foregoing
16 filed this 10th day of November 2016, with:

17 Docket Control
18 Arizona Corporation Commission
19 1200 West Washington Street
20 Phoenix, Arizona 85007

21 Copies of the foregoing hand-delivered/mailed/e-mailed
22 this 10th day of November 2016, to:

23 Teena Jibilian,
24 Administrative Law Judge
25 Hearing Division
26 Arizona Corporation Commission
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